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3 THE HONORABLE JOHN H. CHUN
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12 UNITED STATES DISTRICT COURT
13 WESTERN DISTRICT OF WASHINGTON
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16 UNITED BROTHERHOOD OF CARPENTERS)
17 AND JOINERS OF AMERICA, and PACIFIC)
18 NORTHWEST REGIONAL COUNCIL OF) NO.: 2:22-cv-00245-JHC
19 CARPENTERS,)
20 Plaintiffs,) DECLARATION OF
21) MIKE KWIATKOWSKI
22 v.)
23)
24 EVELYN SHAPIRO,)
25 Defendant.)
26)
27)
28)

I, Mike Kwiatkowski, state and declare as follows:

1. I am current the Executive Secretary-Treasurer of the Indiana/Kentucky/Ohio
2 Reginal Council of Carpenters. Previously, and at all times relevant to the events described in
3 this declaration, I was an employee of the United Brotherhood of Carpenters and Joiners of
4 America (“UBC”) working as an International Representative.

2. I was personally involved in the investigation into suspected vote rigging at the
3 Pacific Northwest Regional Council of Carpenters (“Council”).

1 3. In October 2021, the UBC was invited to impose a trusteeship over the Council
 2 pursuant to the trusteeship procedures of the federal Labor Management Reporting and
 3 Disclosure Act.

4 4. The trusteeship was imposed to investigate vote rigging, among other things.

5 5. I was involved in the investigation into matters at the Council, including vote
 6 rigging.

7 6. As part of the trusteeship, Council employees were required to turn over their
 8 electronics to the UBC.

9 7. On October 25, 2021, I attended the Council's Executive Board meeting, where
 10 then-Executive Secretary-Treasurer, Evelyn Shapiro, made various statements about vote
 11 rigging. As to a 2021 vote, Shapiro stated that vote rigging had occurred during the 2021 AGC
 12 Master Labor Agreement ratification vote.

13 8. On October 26, 2021, I and others interviewed Juan Sanchez regarding whether
 14 he was involved in vote rigging during the 2021 AGC Master Labor Agreement ratification vote
 15 in August 2021. At the time of this interview, I knew that the investigation had produced
 16 information that for a particular vote in August 2021, thousands of votes came from the same IP
 17 address that Sanchez used to vote. When asked whether he was involved in vote rigging,
 18 Sanchez said, after a long pause, "I won't deny that I did." Although Sanchez would not admit
 19 directly he did it, he stated that we had the evidence of vote rigging in the electronics he had
 20 turned over as part of the investigation. Sanchez then left the office and never returned.

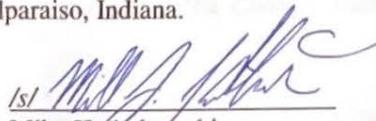
21 9. The next day, I was in a meeting with the Council's former Director of Contract
 22 Administration, Dan Hutchins. Among other things, Hutchins admitted that Shapiro had directed
 23 him, in connection with a 2019 member ratification vote for an Eastern Washington agreement,
 24 to "fix the fucking vote." He also admitted that he had rigged that vote at Shapiro's direction.

25 10. When confronted with what Hutchins had said about rigging votes at her
 26 direction, Shapiro looked at Hutchins and admitted that she told him that. Shapiro then looked at
 27 the others in the room and again admitted stating that to Hutchins but then tried to say she did
 28 not mean what she said. After a few minutes, Shapiro resigned her position as Executive

1 Secretary-Treasurer and as a UBC member. Attached as Exhibit 1 is a copy of Shapiro's
2 resignation. Hutchins apologized and also resigned from his position and union membership.

3 I declare under penalty of perjury that the above statements are true and correct.
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5 Executed this 20th day of May, 2022, in Valparaiso, Indiana.

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7 Mike Kwiatkowski

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